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September 14, 2020

Via ECF

Hon. Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

Re: *United States v. Goldbrenner, et al*, 18-cr-614

Dear Judge Karas:

We write to respectfully request, on behalf of all the defendants, a 30-day adjournment of the universal briefing schedule in this case.

The current briefing schedule for all parties is as follows:

September 22: Defense Sentencing Submissions Due;

October 12: Government Sentencing Submissions Due.

As of yet, the Court has not scheduled any of the defendants' sentencing hearings.

We propose those briefing dates be modified as follows:

October 22: Defense Sentencing Submissions Due;


November 12: Government Sentencing Submissions Due.

The defendants are requesting this extension because the COVID pandemic has made it more difficult than originally anticipated for us to consult with our clients and draft our sentencing submissions, often while working remotely and without support staff. This new proposed schedule will also push the briefing deadlines until after the completion of the Jewish holidays on October 11.

All defense counsel join in this motion. The government opposes this request.

The revised briefing schedule is approved.

So Ordered.



9/15/20

Respectfully submitted,

/s/

Gedalia M. Stern

Counsel for Peretz Klein

cc: All counsel (via ECF)